UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

X

IN RE: COMBINED WORLD TRADE CENTER AND LOWER MANHATTAN DISASTER SITE LITIGATION (STRADDLER PLAINTIFFS)

21 MC 103 (AKH)

X

TAILOR DOMINGUEZ (AND WIFE, JUANNA DOMINGUEZ),

08-CV-2266 (AKH)

Plaintiffs,

-against-

ON-SITE:

FGP 90 WEST STREET, INC.'S NOTICE OF 7 WORLD TRADE COMPANY, L.P.; A RUSSO ADOPTION OF ANSWER TO

WRECKING, INC.; ABM INDUSTRIES, INC.; ABM JANITORIAL NORTHEAST, INC.; AMEC CONSTRUCTION MANAGEMENT, INC.; AMEC EARTH & ENVIRONMENTAL, INC.; ANTHONY CORTESE SPECIALIZED HAULING LLC.; ATLANTIC HEYDT CORP.; BECHTEL ASSOCIATES PROFESSIONAL CORPORATION; BECHTEL CONSTRUCTION, INC.; BECHTEL CORPORATION; BECHTEL ENVIRONMENTAL, INC.: BERKEL & COMPANY, CONTRACTORS, INC.; BIG APPLE WRECKING & CONSTRUCTION CORP; BOVIS LEND LEASE LMB, INC.; BREEZE CARTING CORP.; BREEZE NATIONAL INC.; BRER-FOUR TRANSPORTATION CORP.: BURO HAPPOLD CONSULTING ENGINEERS, P.C.; C B CONTRACTING CORP; CANRON CONSTRUCTION CORP.; CORD CONTRACTING CO., INC.; DAKOTA DEMO-TECH; DIAMOND POINT EXCAVATING CORP; DIEGO CONSTRUCTION, INC; DIVERSIFIED CARTING, INC., DMT ENTERPRISE INC.; D'ONOFRIO GENERAL CONTRACTORS CORP.; EAGLE LEASING & INDUSTRIAL SUPPLY, INC.; EAGLE

ONE ROOFING CONTRACTORS INC; EJ DAVIES,

RECYCLING OF CORONA(EROC); EWELL W.

INC.; EN-TECH CORP.; EVERGREEN

MASTER COMPLAINT

FINLEY, P.C., EXECUTIVE MEDICAL SERVICES, : P.C.; FLEET TRUCKING, INC.; FRANCIS A. LEE EXTERIOR RESTORATION, INC.; FTI TRUCKING, : INC.; GILSANZ, MURRAY, & STEFICEK, LLP, GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC.; HALLEN WELDING SERVICE, INC.; H.P. ENVIRONMENTAL; KOCH SKANSKA INC; LAQUILA CONSTRUCTION INC.; LASTRADA GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGIINEERS P.C.; LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC.; LZA TECH-DIV OF THORTON TOMASETTI; MANAFORT BROTHERS INCORPORATED; MAZZOCCHI WRECKING, INC.; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH AMERICAN CORP.; MRA ENGINEERING, PC; MUESER RUTLEDGE CONSULTING ENGINEERS, INC; NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP.; NICHOLSON CONSTRUCTION COMPANY; PETER SCALAMANDRE & SONS, INC.; PINNACLE ENVIRONMENTAL CORP.; PLAZA CONSTRUCTION CORP.; PRO SAFETY SERVICES LLC.; PT & L CONTRACTING CORP.; ROBER SILMAN ASSOCIATES; ROBERT L. GEROSA, INC.; RODAR ENTERPRISES, INC.; ROYAL GM, INC: SAB TRUCKING INC.: SAFEWAY **ENVIRONMENTAL CORP.**; **SEASONS** INDUSTRIAL CONTRACTING; SEMCOR **EOUIPMENT & MANUFACTURING CORP.:** SILVERITE CONTRACTING CORPORATION; SIMPSON GUMPERTZ & HEGER INC.: SKIDMORE, OWING & MERRILL LLP; SURVIVAIR: TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION CORPORATION OF NEW YORK: TISHMAN INTERIORS CORPORATION: TISHMAN SPEYER PROPERTIES: THORTON-TOMASETTI GROUP, INC.; TORRETTA TRUCKING, INC.: TOTAL SAFETY CONSULTING, L.L.C.; TUCCI EQUIPMENT RENTAL CORP.: TULLY CONSTRUCTION CO.,

INC.; TURNER CONSTRUCTION COMPANY; ULTIMATE DEMOLITION/CS HAULING (JOINT VENTURE); VOLLMER ASSOCIATES LLP.; WEEKS MARINE, INC.; WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C.: WHITNEY CONTRACTING INC.; WOLKOW-BRAKER ROOFING CORP.; WORLD TRADE CENTER PROPERTIES LLC.; WSP CANTOR SEINUK; YANNUZZI & SONS, INC; YONKERS CONTRACTING COMPANY, INC.; YORK HUNTER CONSTRUCTION, LLC; ZIEGENFUSS DRILLING, INC., **OFF-SITE:** BANKERS TRUST COMPANY, BT PRIVATE CLIENTS CORP.; DEUTSCHE BANK TRUST COMPANY AMERICAS, DEUTSCHE BANK TRUST CORPORATION; FGP 90 WEST STREET INC.; HILLMAN ENVIRONMENTAL GROUP, LLC., KIBEL COMPANIES, THE BANK OF NEW YORK TRUST COMPANY NA, TISHMAN INTERIORS CORPORATION, TULLY CONSTRUCTION CO., INC.; TULLY INDUSTRIES, : INC.; and VERIZON NEW YORK, INC.; ET AL, Defendants.

PLEASE TAKE NOTICE THAT Defendant FGP 90 West Street, Inc., by its attorneys, DLA Piper US LLP, as and for its responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the matter captioned *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH), hereby adopts FGP 90 West Street, Inc.'s Answer to Master Complaint dated August 3, 2007, which was filed in that matter. To the extent that FGP 90 West Street, Inc.'s Answer to the Master Complaint does not comprehensively address any of the allegations set forth in the Check-Off Complaint filed in the above-captioned matter, FGP 90 West Street, Inc. denies knowledge or information sufficient to form a belief as to the truth of such allegations.

WHEREFORE, FGP 90 West Street, Inc. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York. June 19, 2008

By: s/ Keara M. Gordon

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